

EXHIBIT C

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8 -and-

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16 Attorneys for Defendant United Air Lines,
17 Inc.

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA

20 ALL NIPPON AIRWAYS COMPANY,)
21 LTD.)

22 Plaintiff,)

23 vs.)

24 UNITED AIR LINES, INC.,)

25 Defendant.)
26)

Case No. C07-03422 EDL
Hon. Elizabeth D. Laporte

27 SECOND AMENDED NOTICE OF TAKING VIDEO DEPOSITIONS
28 [Amended to Correct Date in Exhibits A & B]

TO: Counsel for Plaintiff

PLEASE TAKE NOTICE that the undersigned attorney will take the VIDEO
depositions of the individual(s) listed below upon oral examination before a court
reporter authorized to take depositions in the State of California. Deponent(s) are

1 requested to bring with them to the deposition the documents requested on the
 2 attached Exhibits A and B. The examinations will continue from day to day until
 3 completed. The depositions are being taken for the purpose of discovery, or for such
 4 other purposes as are permitted under the Rules of Court.

<u>Name of Deponent(s)</u>	<u>Date and Time</u>	<u>Location</u>
Teruo Usui	Tuesday November 27, 2007 9:00 a.m.	Condon & Forsyth LLP 1901 Avenue of the Stars Suite 850 Los Angeles, CA 90067-6010 310-557-2030
Bishin Yamaguchi	Wednesday November 28, 2007 9:00 a.m.	
Yusuke Nishiguchi	Thursday November 29, 2007 9:00 a.m.	
Person Most Knowledgeable with regard to those issues described in attached Addendum B (FRCP 30(b)(6))	Friday November 30, 2007 9:00 a.m.	

17 You are invited to attend and cross-examine the witnesses.

18 RealTime and video equipment may be used by our attorney and the court
 19 reporter to transcribe and view instantaneously the testimony of the deponent.
 20 Although additional serial feeds are available, our office takes no responsibility to
 21 arrange for other attorneys' necessary equipment. Said deposition shall be continued
 22 from time to time until completed by an officer authorized by law to administer oaths.

23 DATED: September 27, 2007
 24
 25
 26
 27
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Jaffe, Raitt, Heuer & Weiss

By: 

Scott R. Torpey

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Bar No: (Cal. SB#153763)

--and--

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EXHIBIT A

1. ANA INVESTIGATION FILE: Produce a complete copy of the entire investigation file(s) prepared by or on behalf of ANA relative to the cause and circumstances relating to the October 7, 2003 incident at SFO which is the subject of the above-captioned litigation. Such materials should include but not be limited to unredacted copies of witness statements, reports, correspondence (including any emails or electronic data), photographs and/or any other material of any nature whatsoever that comprises the ANA file(s). To the extent you claim work product/privilege, provide a log with regard to those documents being withheld.
2. ANA PILOT FILES: With regard to Teruo Usui, Bishin Yamaguchi, and Yusuke Nishiguchi, produce unredacted copies of all file materials reflecting with regard to each of these ANA pilots, any accident/incidents which they were involved between 1995 to date, any disciplinary actions between 1995 to date, and records pertaining to their training and certification between 1995 to date. To the extent you claim work product/privilege, provide a log with regard to those documents being withheld.
3. DOCUMENTS REGARDING GROUND HANDLING AGREEMENT: With regard to the "Standard Ground Handling Agreement" including "Annex A - Ground Handling Services" and "Annex B - United Service IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement" between ANA and United in effect on October 7, 2003, produce all documents which reflect or pertain to the negotiating of the terms of this contract, the intent/interpretation of ANA with regard to the term contained in that contract, and the applicability or inapplicability of the agreement with regard to the events of October 7, 2003 at SFO which is the subject of this litigation. To the extent you claim any of these documents as work product/privileged, provide a log with regard to those documents being withheld.

EXHIBIT B

Pursuant to FRCP 30(b)(6) you are hereby requested to designate one or more officers, directors, or managing agents, or other persons who consent to testify on behalf of ANA who are the most knowledgeable individuals with regard to one or more of the following topics:

1. Negotiations leading up to agreement and signature of the "Standard Ground Handling Agreement" (including "Annex A - Ground Handling Services" and "Annex B - United Services IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement").
2. Interpretation and intent of the provisions within the "Standard Ground Handling Agreement" (including "Annex A - Ground Handling Services" and "Annex B - United Services IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement").
3. The applicability of one or more of the terms within the "Standard Ground Handling Agreement" (including "Annex A - Ground Handling Services" and "Annex B - United Services IATA Standard Ground Handling Agreement" attached to the "Standard Ground Handling Agreement") to the events of October 7, 2003 which are at issue in this litigation.

CERTIFICATE OF SERVICE

Phyllis L. Nelson certifies that she is an employee of Jaffe, Raitt, Heuer & Weiss, P.C. and that on September 27, 2007 she caused to be served Second Amended Notice of Taking Video Depositions on the person(s) listed below by placing said document(s) in a sealed envelope (if applicable), properly addressed, and forwarding same by the method(s) indicated.

By Fax and First Class Mail

Frank A. Silane
Rod D. Margo
Scott D. Cunningham
Condon & Forsyth LLP
1901 Avenue of the Stars, Suite 850
Los Angeles, CA 90067-6010

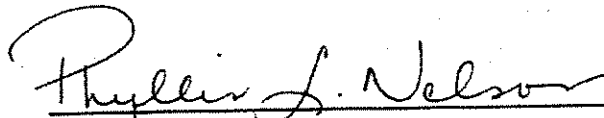
By Fax and First Class Mail

Jeffrey A. Worthe
Worthe, Hanson & Worthe
1851 E. First St., Ste. 900
Santa Ana, CA 92705

By Fax and First Class Mail

Marshall S. Turner
Condon & Forsyth LLP
7 Times Square
New York, NY 10036

Dated: September 27, 2007


Phyllis L. Nelson